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16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 vs.
23 **DECLARATION OF FELIPE
24 CORREDOR IN SUPPORT OF
25 PLAINTIFF WAYMO LLC'S
26 ADMINISTRATIVE MOTION TO FILE
27 UNDER SEAL ITS OPPOSITION TO
28 DEFENDANTS' MOTION IN LIMINE
NO. 27 TO EXCLUDE PROF.
HESSELINK'S SAVED DEVELOPMENT
TIME OPINIONS**

29 UBER TECHNOLOGIES, INC.;
30 OTTOMOTTO LLC; OTTO TRUCKING
31 LLC,

32 Defendants.

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1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of its Opposition to Defendants’ Motion in Limine to
 7 Exclude Prof. Hesselink’s Saved Development Time Opinions (“Waymo’s Opposition”). Waymo’s
 8 Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Opposition	Highlighted portions	Waymo
Exhibit 2 to Waymo’s Opposition	Entire document	Waymo and Defendants
Exhibit 3 to Waymo’s Opposition	Highlighted portions	Waymo
Exhibit 4 to Waymo’s Opposition	Entire document	Defendants
Exhibit 5 to Waymo’s Opposition	Entire document	Waymo and Defendants
Exhibit 7 to Waymo’s Opposition	Entire document	Waymo and Defendants
Exhibit 8 to Waymo’s Opposition	Entire document	Waymo and Defendants

15 3. Waymo’s Opposition and exhibits thereto contain information that Defendants have
 16 designated as confidential and/or highly confidential.

17 4. Waymo’s Opposition and exhibits thereto also contain or refer to trade secret
 18 information, which Waymo seeks to seal. The portions of Waymo’s Opposition and the exhibits
 19 thereto identified above contain, reference, and/or describe Waymo’s asserted trade secrets, including
 20 as misappropriated by Defendants. Specifically, the documents and/or highlighted portions describe
 21 certain technical specifications of Waymo’s trade secrets. I understand that these trade secrets are
 22 maintained as secret by Waymo (Dkt. 25-47) and are valuable as trade secrets to Waymo’s business
 23 (Dkt. 25-31). The public disclosure of this information would give Waymo’s competitors access to in-
 24 depth descriptions—and analysis—of the functionality of Waymo’s autonomous vehicle system. If
 25 such information were made public, I understand that Waymo’s competitive standing would be
 26 significantly harmed. Waymo’s request to seal is narrowly tailored to only the confidential
 27 information.

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct, and that this declaration was executed in San Francisco, California, on November 20,
3 2017.

4 By /s/ Felipe Corredor
5 Felipe Corredor
6 Attorneys for WAYMO LLC

7 **SIGNATURE ATTESTATION**

8 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
9 filing of this document has been obtained from Felipe Corredor.

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11 /s/ Charles K. Verhoeven
12 Charles K. Verhoeven

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